

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
CAMDEN DIVISION**

<b>IN RE: Valsartan N-Nitrosodimethylamine (NDMA), and Irbesartan Products Liability Litigation</b>	<b>MDL No. 2875 Civil No.: 19-02875 (RBK)</b>
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**AMENDED NOTICE OF VIDEOTAPED DEPOSITION OF  
PUTATIVE CLASS REPRESENTATIVE CHARLIE JOHNSTON**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, Dkt. 632), Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Solco Healthcare U.S., LLC, Huahai U.S., Inc., and Princeton Pharmaceutical Inc. will take the deposition upon oral examination of Charlie Johnston on November 30, 2021 at 9:00 a.m. PST, and continuing until completion, via remote deposition while the witness is at his home or office or other location agreed to by the parties.

Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. Counsel who wish to attend remotely will have the option to do so using audio-visual conference technology and should contact Golkow Technologies at [scheduling@golkow.com](mailto:scheduling@golkow.com) to arrange for login credentials to be sent to them prior to the deposition.

The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case.

The attorney contact for the deposition is:

Alyson Walker Lotman  
Duane Morris LLP  
30 South 17th Street  
Philadelphia, PA 19103-4196  
(215) 979-1177  
[ALotman@duanemorris.com](mailto:ALotman@duanemorris.com)

Date: November 24, 2021

Respectfully submitted,

s/ Alyson Walker Lotman  
Alyson Walker Lotman  
Duane Morris LLP  
30 South 17<sup>th</sup> Street  
Philadelphia, PA 19103-4196  
(215) 979-1177  
[ALotman@duanemorris.com](mailto:ALotman@duanemorris.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 24<sup>th</sup> day of November, 2021, a true and correct copy of the foregoing Amended Notice of Videotaped Deposition of Plaintiff Charlie Johnston was served upon the following by e-mail, with copies to all defense counsel of record via CM/ECF:

John R. Davis  
Slack Davis Sanger LLP  
6001 Bold Ruler Way, Suite 100  
Austin, TX 78746  
(512)795-8686  
[jdavis@slackdavis.com](mailto:jdavis@slackdavis.com)  
*Attorneys for Plaintiff*

Clonlee Whiteley  
David Stanoch  
Kanner & Whiteley, LLC  
701 Camp Street  
New Orleans, LA 70130  
(504) 524-5777  
[c.whiteley@kanner-law.com](mailto:c.whiteley@kanner-law.com)  
[d.stanoch@kanner-law.com](mailto:d.stanoch@kanner-law.com)  
*Liaison Counsel for Plaintiffs*

Golkow Technologies (via email)

s/ Alyson Walker Lotman  
Alyson Walker Lotman